

## **EXHIBIT D**

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
SHIRLEY WRUBEL, as Trustee of the Sara Hollander  
Irrevocable Life Insurance Trust,

Docket No. 11-cv-01873  
(DLI)(LB)

Plaintiff,

-against-

JOHN HANCOCK LIFE INSURANCE CO.,

Defendant.  
-----X

TO: Sean R. Flanagan, Esq.  
Kelley Drye & Warren LLP  
Attorneys for Defendant  
101 Park Avenue  
New York, New York 10178

**PLAINTIFF'S REQUEST FOR ADMISSIONS**

**PLEASE TAKE NOTICE** that, pursuant to Rule 36(a)(1)(B) of the Federal Rules of Civil Procedure, plaintiff Shirley Wrubel, as Trustee of the Sara Hollander Irrevocable Life Insurance Trust, respectfully requests that defendant John Hancock Life Insurance Company admit the genuineness of the following documents:

1. Admit that the policy attached as Exhibit A is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.
2. Admit that the policy attached as Exhibit B is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

3. Admit that the policy attached as Exhibit C is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

4. Admit that the policy attached as Exhibit D is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

5. Admit that the policy attached as Exhibit E is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

6. Admit that the policy attached as Exhibit F is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

7. Admit that the policy attached as Exhibit G is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

8. Admit that the policy attached as Exhibit H is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

9. Admit that the policy attached as Exhibit I is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

10. Admit that the policy attached as Exhibit J is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

11. Admit that the policy attached as Exhibit K is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

12. Admit that the policy attached as Exhibit L is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

13. Admit that the policy attached as Exhibit M is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.


14. Admit that the policy attached as Exhibit N is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of

the bound policy as it was delivered to the owner of the policy.

15. Admit that the policy attached as Exhibit O is a true and accurate copy of a policy of life insurance issued by John Hancock and that the attached copy is an exact copy of the bound policy as it was delivered to the owner of the policy.

Dated: Kew Gardens, New York  
July 16, 2012

LIPSIUS-BENHAIM LAW, LLP  
Attorneys for Plaintiff

  
By: \_\_\_\_\_  
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